

EXHIBIT I

Phillips Declaration

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

**REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,**

Defendants.

Civil Action No. 23 CV 1057

**NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,**

Plaintiffs,

v.

**PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,**

Defendants.

Civil Action No. 23 CV 1104

**AFFIDAVIT OF ROBERT PHILLIPS
EXECUTIVE DIRECTOR OF COMMON CAUSE NORTH CAROLINA**

I, Robert “Bob” Phillips, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a resident of Wake County, where I have lived since 1981. I am a native of Charlotte, North Carolina and have lived in the Triangle area for more than 48 years.
2. Since 2001, I have served as Executive Director of Common Cause North Carolina (“CCNC”), a state chapter of National Common Cause (“Common Cause”), which is a 501(c)(4) registered nonpartisan, nonprofit grassroots organization dedicated to upholding the core values of American democracy. Before becoming Executive Director of CCNC, I was hired as a full-time consultant to manage CCNC’s 501(c)(3) grant awarded for nonpartisan public outreach and education on pro-democracy reforms. Prior to joining Common Cause, I worked as a local television journalist and Communications Director for the Office of Lieutenant Governor.
3. As Executive Director of CCNC, I manage a diverse staff of sixteen people who work in the Triangle, Triad, Charlotte, Sandhills, and Northeast regions. I help design and implement policy and program priorities for Common Cause NC. I represent CCNC before the public, the media, decisionmakers, and donors. I am also a registered lobbyist for Common Cause at the North Carolina General Assembly, and have worked with lawmakers on both sides of the aisle on matters related to redistricting reform.
4. I am authorized to speak for Common Cause in this case.
5. Since its founding in 1970, Common Cause has been dedicated to fair elections and making government at all levels more representative, open, and responsive to the interests of ordinary people. Common Cause regularly assists voters in understanding and navigating the election process, provides resources to help voters determine their districts and polling locations, and mobilizes voters to engage in political advocacy.
6. Common Cause has been one of the leading proponents of redistricting reform, conducting public education, advocacy, legislative lobbying, and participating in litigation in order to secure fair maps for all North Carolinians. This includes seeking to protect the interests of members to vote under lawful and constitutional voting plans that do not deny them equal voting power or deny them an equal opportunity to elect

candidates of their choice, or otherwise dilute their vote, sort, or discriminate them, on account of race.

7. These efforts are germane to Common Cause's mission around fair elections and encouraging a more representative, open, and responsive government. As part of that mission, Common Cause has educated members and the public about the redistricting process, including how to participate, monitor, and hold decision-makers accountable. Common Cause has researched state redistricting practices to identify best practices for creating a legal, transparent, responsive, and equitable redistricting process. It also assists voters in navigating the elections process, provides resources to help voters determine their districts and polling places, and mobilizes voters to engage in advocacy for government accountability. Voting maps that diminish voting power of specific racial groups, or that gerrymander along racial lines, directly impede our mission of ensuring every vote is afforded equal value in the state, and that all North Carolinians have responsive and accountable government regardless of their racial identity.
8. As part of my Executive Director responsibilities, I work with our national office and supervise my team in North Carolina, to oversee the maintenance of CCNC's statewide membership, supporter, and staff lists, records and information. Common Cause currently has over 25,000 members, staff, and supporters in North Carolina.
9. Based on my review of the Common Cause member database and of publicly available information in the North Carolina voter registration database, I am personally aware that we have members who have self-identified as Black or African American who are currently registered to vote in the state in at least the following counties as of July 2024:
 - a. Edgecombe County;
 - b. Forsyth County;
 - c. Franklin County;
 - d. Guilford County;
 - e. Lenoir County;
 - f. Martin County;

- g. Mecklenburg County;
- h. Pasquotank County;
- i. Pitt County;
- j. Vance County;
- k. Wayne County; and
- l. Wake County.

10. These include members with the same qualifications who are in at least the following areas as of July 2024:

- a. 2023 Senate Plan districts 1, 3 & 40;
- b. 2023 House Plan districts 5, 7, 8, 9, 10, 12, 23, 32, 37 & 71; and
- c. 2023 Congressional Plan districts 1 & 5.

11. These are far from the only areas in which Common Cause has members. I am able to use the same methods to identify members living in additional districts or areas of the state who are registered voters and identify as Black or African American if that becomes required to maintain standing in this lawsuit.

12. In order to be an active member of Common Cause, an individual must have donated financially to the organization and/or taken an action with Common Cause in the last two years. Actions can include, but are not limited to, participating in a community event with Common Cause, volunteering as a Common Cause election observer, or advocating for a policy in support of Common Cause goals with an elected representative as part of an advocacy campaign.

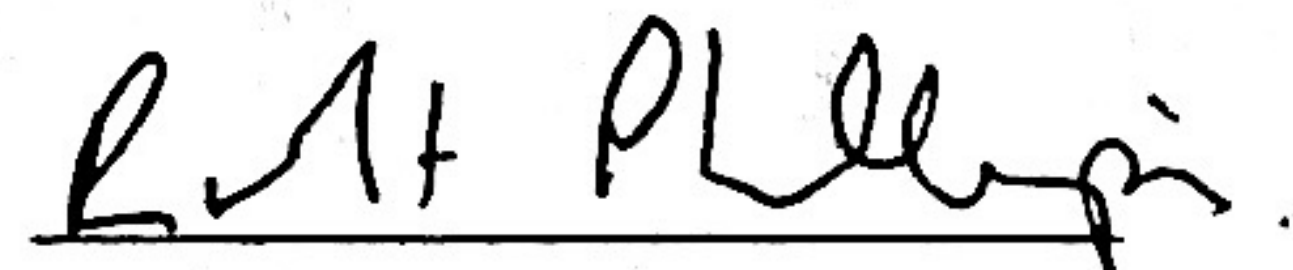
13. Common Cause historically keeps its membership list and member information confidential. Due to privacy concerns, and the risk of retaliation, Common Cause is reticent to reveal the name and addresses of our members. I believe that the specific identification of our members would place their safety and privacy in jeopardy. In the current political climate, private individuals are finding themselves increasingly vulnerable to public attacks, conflicts, and doxing. As a result, community members have experienced a chilling effect on their desire and capacity to be publicly affiliated with

even nonpartisan organizations that engage in civic issues. Individual members have expressed a fear of the impact that public identification would have on their livelihood.

14. I was also made aware that Legislative Defendants have expressed an intent to depose any members that we identify to them. I believe this would deter many individuals from joining Common Cause and cause current members to leave the organization. Common Cause exists to allow individuals to support advocacy for better government without having to expose themselves to the burdens of litigation or to risk retaliation and intimidation when we challenge the actions of those in power in government. But if individuals believed that, by becoming members, they were automatically exposing themselves to the risk of being deposed and publicly identified, I believe (based on more than two decades of experience working with Common Cause members) that it would impose an insurmountable barrier to participation in our organization for individuals who otherwise care deeply about our organizational objectives and wish to privately engage and support them. The impact of that on our organization would be severe.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 10-2-24



Robert Phillips